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Attorneys for Plaintiff
CYNTHIA RICKS

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CYNTHIA RICKS, an individual,

Case No. 2:20-cv-01359-KJD-(VCF)

Plaintiff,

**THE PARTIES STIPULATION and
(PROPOSED) ORDER
TO EXTEND THE DISCOVERY PLAN and
SCHEDULING ORDER**

vs.

(Fed. R. Civ. P. 26(f) and LR 26-1(e))

**SUN LIFE ASSURANCE COMPANY OF
CANADA**, a foreign corporation, doing
business as SUN LIFE FINANCIAL,

SECOND REQUEST

Defendant.

Plaintiff, **CYNTHIA RICKS**, by her counsel, Steven J. Parsons of LAW OFFICES OF STEVEN J. PARSONS and Defendant, **SUN LIFE ASSURANCE COMPANY OF CANADA**, by its counsel, Kristina N. Holmstrom of OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C. hereby stipulate to jointly request that the parties be given additional time to complete discovery.

The parties have met and conferred and respectfully represent that the parties explored the possibility of settlement. In settlement discussions the parties agreed that discovery needed to be completed before a settlement could be reached. Both parties are willing to reconsider settlement once discovery is completed.

Discovery completed to date:

Defendant served Interrogatories and Requests for Production of Documents on Plaintiff on February 24, 2021. Plaintiff is in the process of preparing responses and anticipates having them completed no later than April 26, 2021.

Plaintiff served Interrogatories on Plaintiff on March 23, 2021. Defendant is in the process of preparing responses and anticipates having them completed no later than May 21, 2021.

Current Deadlines:

Discovery Cutoff:	August 2, 2021
Amend Pleadings/Add Parties:	May 4, 2021
Initial Expert Disclosures:	May 4, 2021
Rebuttal Expert Disclosures:	June 3, 2021
Dispositive Motions:	September 1, 2021
Joint Pretrial Order:	October 1, 2021
Interim Status Report:	June 3, 2021

The parties respectfully request the court extend the current deadlines by 90 days to allow the parties to complete discovery and again explore the possibility of settlement.

Proposed Deadlines:

Discovery Cutoff:	November 1, 2021
Amend Pleadings/Add Parties:	August 2, 2021
Initial Expert Disclosures:	August 2, 2021
Rebuttal Expert Disclosures:	September 1, 2021
Dispositive Motions:	December 1, 2021
Joint Pretrial Order:	December 30, 2021
Interim Status Report:	September 1, 2021

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.



1 Dated: Thursday, April 22, 2021.

2 LAW OFFICES OF STEVEN J. PARSONS

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

3 /s/ Steven J. Parsons
4 STEVEN J. PARSONS
Nevada Bar No. 363

/s/ Kristina Holmstrom
KRISTINA HOLMSTROM
Nevada Bar No. 10086


5 Attorney for Plaintiff
6 CYNTHIA RICKS

Attorneys for Defendant
SUN LIFE ASSURANCE COMPANY OF CANADA

7 **ORDER**

8 **IT IS SO ORDERED.**

9 Dated: 4-22-2021
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12 U.S. MAGISTRATE JUDGE
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